EXHIBIT GC054

CAUSE NO. 22-CV-0675

SALT & PEPPER RESTAURANTS, INC.,

Plaintiff

v.

v.

TIGHT ENDS SPORTS BAR & GRILL, LLC

and TIMOTHY DUNGAN, Defendants

BANKSOUTH, Garnishee in the district court

GALVESTON COUNTY, TE

56th JUDICIAL DISTRICT

GARNISHEE'S ANSWER TO PLAINTIFF'S WRIT OF GARNISHMENT

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Garnishee BankSouth files this *Answer to Plaintiff's Writ of Garnishment* pursuant to Texas Rule of Civil Procedure 665.

ANSWER

- 1. Garnishee is indebted to Tight Ends Sports Bar & Grill, LLC and Tim Dungan in the amount of \$1,163,326.24 as of July 26, 2022. Garnishee was indebted to Tight Ends Sports Bar & Grill, LLC and Tim Dungan in the amount of \$142,080.04 on July 14, 2022, the date on which the writ was received.
- 2. Garnishee does not have and has never had any effects of Tight Ends Sports Bar & Grill, LLC and Tim Dungan.
- 3. Further, Garnishee is not aware of any other persons, within its knowledge, which are indebted to Tight Ends Sports Bar & Grill, LLC and Tim Dungan or have effects belonging to them.

22 – CV – 0675 DCORANSW Original Answer 2417526

Respectfully submitted,

BankSouth

David Cowles, COO 6340 Lake Oconee Pari

6340 Lake Oconee Parkway Greensboro, Ga 30642

706 453 2943

dcowles@banksouth.com

GARNISHEE

CAUSE NO. 22-CV-0675

SALT & PEPPER RESTAURANTS, INC.,

Plaintiff

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TIGHT ENDS SPORTS BAR & GRILL, LLC and TIMOTHY DUNGAN,

Defendants

BANKSOUTH, Garnishee

v.

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GALVESTON C

56th JUDICIAL DISTRICT

DECLARATION OF REPRESENTATIVE

Pursuant to Section 132.001 of the Texas Civil Practice and Remedies Code, I, David Cowles, declare as follows:

- My name is David Cowles and I am over 18 years old, and I am fully competent to 1. make this declaration. Each statement of fact contained in the foregoing Garnishee's Answer to Plaintiff's Writ of Garnishment is within my personal knowledge and is true and correct.
 - 2. I am the Chief Operating Officer of BankSouth.
- 3. All of the facts stated in the foregoing document are within my personal knowledge and are true and correct.

My name is David Cowles. My date of birth is 12-6-56, and my address is 6340 Lake Oconee Parkway Greensboro, Ga 30642. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Greene County, Georgia, on July 27, 2022.

David Cowles

CERTIFICATE OF SERVICE

David Cowles

Preston Kamin Gray Reed 1300 Post Oak Blvd., Suite 2000 Houston, Texas 77056

John P. Henry John Henry & Associates, PLLC 407 West Liberty Street Round Rock, Texas 78664



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KSOUTH

OLAKE OCONEE PKWY
ITE 101

(EENSBORO, GA 30642

NITED STATES US

JOHN D. KINARD, DISTRICT CLERK

BILL SENDER

URA FOSTER

(706) 817-1820

GALVESTON TX 77551
(409) 766-2424 REF. TIGHT ENDS ANSWER

PRIORITY OVERNIGHT FRI - 29 JUL 10:30A

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